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22 Attorneys for Defendant
23 CITY AND COUNTY OF SAN FRANCISCO

24 UNITED STATES DISTRICT COURT
25 NORTHERN DISTRICT OF CALIFORNIA

26 HASTINGS COLLEGE OF THE LAW, a
27 public trust and institution of higher education
28 duly organized under the laws and the
Constitution of the State of California;
FALLON VICTORIA, an individual; RENE
DENIS, an individual; TENDERLOIN
MERCHANTS AND PROPERTY
ASSOCIATION, a business association;
RANDY HUGHES, an individual; and
KRISTEN VILLALOBOS, an individual,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, a municipal entity,

Defendant.

Case No. 4:20-cv-3033-JST

**DECLARATION OF MICHAEL MASON IN
SUPPORT OF DEFENDANT CITY AND
COUNTY OF SAN FRANCISCO'S
OPPOSITION TO PLAINTIFFS' MOTION TO
ENFORCE STIPULATED INJUNCTION**

Hearing Date: May 23, 2024
Time: 2:00 p.m.
Place: Hon. Jon S. Tigar
Oakland Courthouse
Courtroom 6 – 2nd Floor
1301 Clay Street
Oakland, CA 94612

Trial Date: Not Set

1 I, MICHAEL MASON, declare:

2 1. I have personal knowledge of the matters stated herein except where otherwise stated,
3 and if called and sworn as a witness, could and would competently testify thereto.

4 2. I work for the San Francisco Fire Department and am employed as the Section Chief of
5 Administration within the Community Paramedicine Division.

6 3. The Community Paramedicine Division allows the Fire Department to collaborate with
7 other City agencies and provide tailored services to traditionally under-privileged populations, some of
8 whom are not served best by the standard emergency care system. This includes many of the City's
9 unhoused residents. The Community Paramedicine Division provides proactive, compassionate, and
10 respectful care that connects people to the appropriate resources for their medical, mental health, and
11 social needs. Our teams can assist in providing immediate stabilization of medical and behavioral
12 health emergencies, as well as helping our community to navigate an often-confusing array of services
13 for those not experienced in obtaining care. This means helping to connect people to housing, primary
14 and mental health care, detox services, pre-hospital treatment plans, and many other services to assist
15 our populations in need.

16 4. The Community Paramedicine Division operates three programs: (1) EMS-6, which
17 focuses on the highest users of the emergency care system, (2) Street Crisis Response Team, which
18 responds to individuals experiencing behavioral health crises, and (3) Street Overdose Response
19 Team, which responds in real-time to drug overdose survivors.

20 5. I have held my current role as Section Chief since December 2021. I previously worked
21 as a paramedic for the Fire Department. My role immediately prior to becoming Section Chief was as
22 a Rescue Captain in the EMS-6 Community Paramedicine Division.

23 6. As a result of my personal experience working with the Fire Department, I am aware of
24 the outreach programs the Fire Department Participates in around homelessness and public health
25 including the Street Crisis Response Team ("SCRT").

26 7. The San Francisco Fire Department launched SCRT on November 30, 2020 in
27 partnership with the Department of Public Health ("DPH"). The team is dispatched in response to calls
28 from the public made to San Francisco's 911 call center. SCRT provides rapid, trauma-informed care

1 to people in acute behavioral health crisis and to those who have needs that may not require an
2 ambulance to transport to an emergency department.

3 8. Prior to March of 2023, DPH's Behavioral Health Services coordinated with the Fire
4 Department on day-to-day oversight of SCRT and employed the behavioral health clinicians who
5 participated in SCRT. In March 2023, the program shifted organizational structure to the Fire
6 Department having primary day-to-day oversight of the team. The behavioral health clinicians who
7 previously participated in SCRT moved to work with the newly created BEST Neighborhoods
8 Program. At the same time, the role of DPH shifted to providing follow-up services for individuals
9 who had contact with SCRT.

10 9. SCRT operates City-wide, including in the Tenderloin, 24 hours a day, seven days a
11 week.

12 10. SCRT provides linkages to shelter, drug and alcohol sobering centers, mental health
13 clinics and residential programs, urgent care, and care coordination.

14 11. City-wide in February 2024, SCRT received 1,289 calls for service, and was on-scene
15 for a client encounter 1,097 times, resulting in 864 occasions where SCRT engaged with a person at
16 the scene. Collectively from November 2020 through the end of February 2024, SCRT received
17 38,678 calls for service, and was on-scene for a client encounter 29,996 times, resulting in 20,130
18 occasions where SCRT engaged with a person at the scene. This data is publicly available online
19 through SCRT's website at <https://www.sf.gov/street-crisis-response-team>.

20 12. I also instructed my team to further geo-fence SCRT's data to identify encounters and
21 engagements in the Tenderloin. From January 1, 2021 through April 3, 2024, SCRT was dispatched to
22 the Tenderloin 8,403 times, resulting in 4,638 medical assists, 2,357 transportation assists, 795 narcan
23 assists, and 674 referrals to the Homeless Outreach Team ("HOT").

24 13. In addition to the initial care delivered on-scene, SCRT team members connect people
25 with continued treatment, including psychiatric urgent care, sobering centers, social detox programs,
26 withdrawal management, respite, shelter, and other services.

27 14. Based on my personal experiences and observations, I believe San Francisco makes
28 reasonable efforts under the circumstances to achieve its goal of providing services to individuals in

1 crisis around the City and in the Tenderloin specifically, including connecting those individuals with
2 housing and supporting those experiencing substance abuse disorders on City streets. Those efforts
3 have the effect of reducing the City's tent count, including in the Tenderloin neighborhood.

4

5 I declare under penalty of perjury under the laws of the United States and the State of
6 California that the foregoing is true and correct. Executed April 15, 2024 in San Francisco, California.

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9 MICHAEL MASON
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